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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

BRUNSWICK SURGICAL CENTER, LLP and
JERSEY AMBULATORY CENTER, LLC,

Case No. 09-cv-5857

Plaintiffs,

Civil Action

vs.

CIGNA CORPORATION and its subsidiaries
CIGNA HEALTHCARE OF NEW JERSEY
and CONNECTICUT GENERAL
LIFE INSURANCE COMPANY,

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

Defendants.

To: Gibbons, P.C.
One Gateway Center
Newark, NJ 07102-5310
Attn: Jennifer Marino Thibodaux, Esq.

PLEASE TAKE NOTICE that the undersigned Attorneys for the Plaintiffs,
Brunswick Surgical LLP and Jersey Ambulatory Surgical LLC, hereby apply to the
Honorable Anne E. Thompson, United States District Judge at the United States
Courthouse, Clarkson S. Fisher U.S. Courthouse 402 E. State Street Trenton, NJ 08608
for an Order granting Summary Judgment on Plaintiffs' Motion for insurance coverage
under the various health insurance policies issued by the Defendants.

PLEASE TAKE FURTHER NOTICE that in accordance with the Court's Directive, this Motion is being filed on or before March 12, 2010, and the Opposition papers are to be filed on or before April 5, 2010.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the Statement of Material Facts and the Memorandum of Law filed with the Motion.

PACIFICO & LAWRENCE

By: s/ Gregory J. Lawrence
Gregory J. Lawrence (GL5668)

Dated: March 10, 2010

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed with the Clerk of the court using the CM/ECF system which will send notification of such filing to Jennifer Marino Thibodaux, Esq. A paper copy of the above with a cover letter has been sent to the Hon. Lois H. Goodman, U.S.M.J.

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CIGNA HEALTHCARE OF NEW JERSEY
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LIFE INSURANCE COMPANY,

ORDER

Defendants.

THIS MATTER having been opened to the Court by Gregory J. Lawrence, Esq.,
Attorney for Plaintiffs, Brunswick Surgical Center LLP and Jersey Ambulatory Center
LLC; and the Court having considered the opposition submitted thereto; and for good
cause having been shown,

IT IS HEREBY ORDERED on this _____ day of _____, 2010,
that the Plaintiffs are granted Summary Judgment on the issue of coverage under the
various health insurance policies having been issued by the Defendants for the facility fees
claimed by the Plaintiffs;

AND IT IS FURTHER ORDERED that a copy of this Order be forwarded to Counsel for Liberty Mutual within seven (7) days of the date hereof.

Hon. Anne E. Thompson U.S.D.J.